# Allowable Costs, WUFAR, and WISEgrants

How WISEgrants uses WUFAR to assist subrecipients in meeting Allowable Cost Requirements

Federal Funding Conference February 2019



# **WUFAR**

# **WISEgrants**

- Reporting system that can also be used as an accounting system.
- Not required accounting, but required for reporting and claims to DPI.
- Always used for the State Budget and LEA Annual Reports.

- Single web-based portal for federal grants administered by DPI.
- Creates consistency in federal grant accounting across DPI programs.
- Utilizes WUFAR as the foundation for budgets and claims.
- Contains application, budget, and claims for larger grants
- Processes subaward documents for all federal grants administered by DPI



# **WISEgrants Current Grants**

### Formula Grants

These grants reside within WISEgrants, including the application, budget, and claims.

- ❖ ESEA Titles I-A, I-D, II-A, III-A, IV-A, and V-B RLIS
- IDEA Flow-through & Preschool
- Perkins CTE

Each grant has
established
its own set of
"allowable costs" within
WISEgrants through the
options available in the
grant budget's
drop-down menus.

# **WISEgrants Current Grants**

### **Discretionary Grants**

The budget and claims for these grants reside within WISEgrants. The application requirements for these grants are completed outside of WISEgrants.

- **❖** IDEA Discretionary Grants
- Title I-C Migrant Education
- Education for Homeless Children and Youth
- Wisconsin Charter Schools Program

Each grant has
established
its own set of
"allowable costs" within
WISEgrants through the
options available in the
grant budget's
drop-down menus.

# Uniform Grant Guidance

# Subpart E – Cost Principles

- Addresses 55 "items of cost" that receive clarification regarding allowability, in general, for using federal funds.
- Is not an exhaustive or minutely detailed list, so...Provides guidance on "Basic Considerations" to apply to all costs, listed or not listed.

# Factors affecting allowability of costs

- ❖ Is the cost <u>allowed</u> under the specific federal grant program? §200.403 (b)
- ❖ Is the cost necessary to meet the program objectives? §200.403 (a)
- ❖ Is the amount of the cost reasonable? §200.404
  - Did the subrecipient follow sound business practices?
  - Would the cost be considered a fair market price?
- ❖ Would the same cost be funded with local dollars? §200.403 (c)
  - Did the LEA consider its responsibilities to the LEA, its students, the public, and government?
- ❖ Is there supporting documentation for charges to the grant? §200.403 (g)

### Allocable to the Federal Award

A cost is allocable to a particular Federal award if the goods/services involved are assignable to that Federal award in accordance with relative benefits received. (2 CFR §200.405(a))

To what extent are the expenditures charged to a particular grant program benefiting the program?

# Allocable to the Federal Award

When a subrecipient charges 100 percent of an expenditure to a federal program, the LEA must ensure that the program is receiving the entire benefit of these costs.

### Example:

100 supplemental reading program site licenses are purchased with IDEA flow-through funds.

The LEA uses 75 site licenses for special education and 25 site licenses for "any student who needs it." This is <u>not</u> allocable. The cost of 25 site licenses would be considered an unallowed cost.

A teacher spends 25% of her time working on the federal program objectives, therefore 25% of the teacher's salary is charged to the federal award.

Grant funded staff use the Internet, so the LEA charges 3% of its network costs to the federal award.

Allocable with supporting Time and Effort documentation

Not Allocable – not based on actual usage or cost

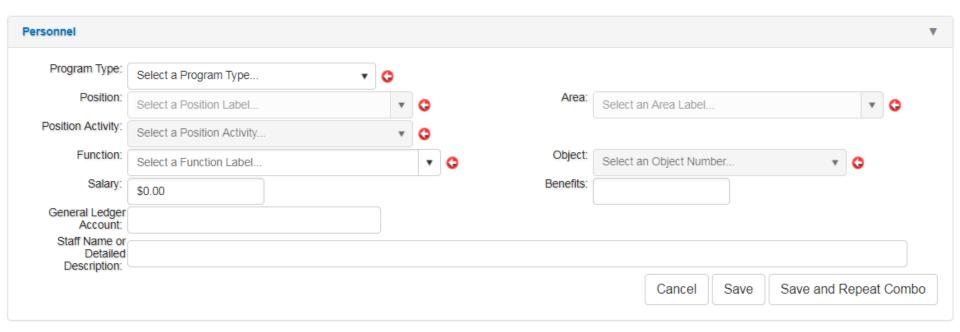
### **Allowable Costs Drive Choices**

The budget drop-down choices available within WISEgrants are driven by allowed costs under each program.

If you can't find it, look for technical assistance on allowable costs (such as IDEA) or contact the DPI consultant assigned to your agency to follow-up on an allowable costs.



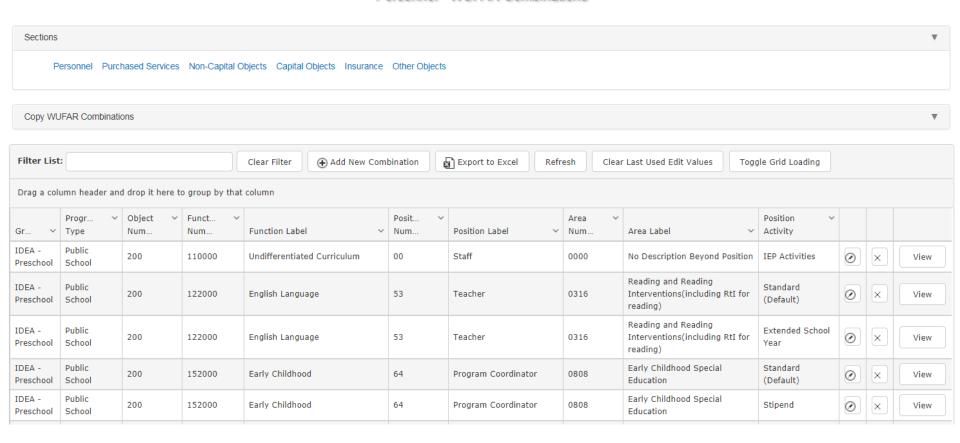
### What the end user sees:



Each selection prefills the next drop-down choice

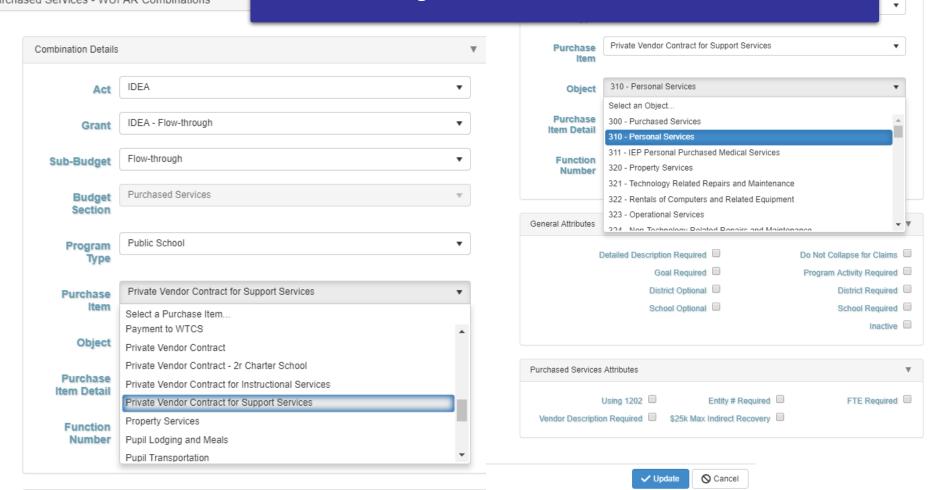
### Behind the magic – the WUFAR Combination Creations

#### Personnel - WUFAR Combinations



#### Purchased Services - WUFAR Combinations

### **Behind the magic - the WUFAR Combination Creations**



# **Program Types in WISEgrants**

Some federal program have requirements in which subrecipients must spend grant funds on certain prescribed activities.

- IDEA Flow-through / Preschool
- IDEA Title I-A, Title II-A, Title III-A, Title IV-A, Wisconsin Charter School Program

These categories of cost are represented in WISEgrants by Program Types. Program Types will be the first selection required when budgeting.

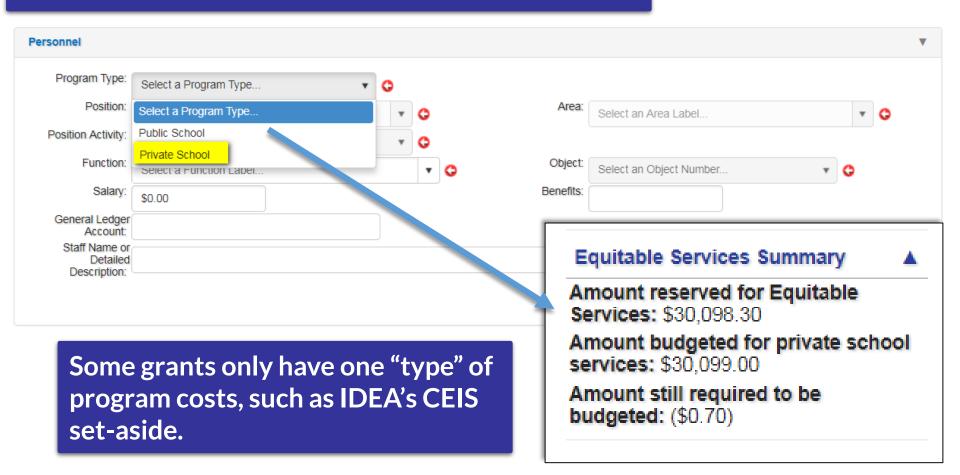
As with all fields within budgeting, if there is only one available selection, the field will populate with the only selection (e.g. grants that have only one Program Type)

# **WISEgrants Terminology – Program Type**

**Drives WUFAR...** What It Is **WISEgrants Program Type** Classification None **Private School Administration Public School** Safe and Healthy **Family Schoolwide Schools** 

**Engagement** 

### **Program Type tracks categories of program costs**



# **WISEgrants Personnel Section**

Each budget item requires a "Position" and "Area"

- Matches the position and area available in WISEstaff.
- License validation is built into WISEgrants for certain positions.

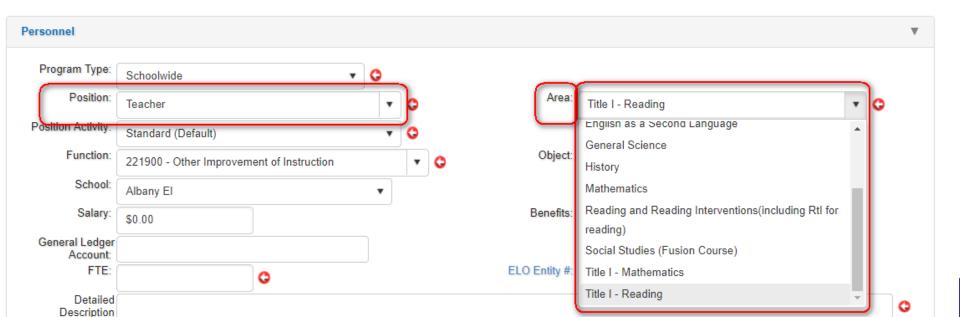
Each budget item requires a "Position Activity"

"Standard (Default)" means full-time or part-time and may require a license number or a staff name. If a license number or name is required, only one individual's salary and benefits should be included in the budget entry.

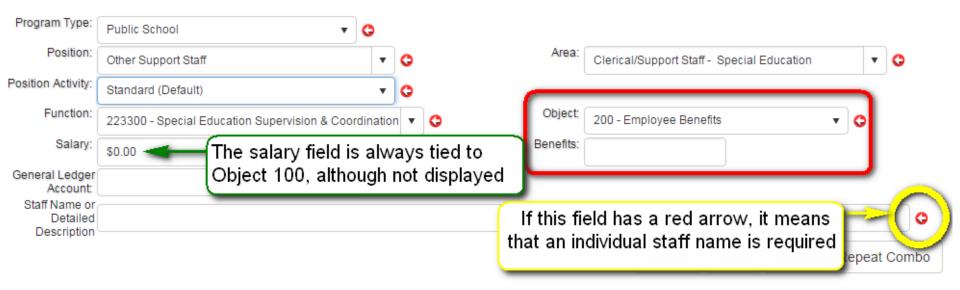
# **Personnel Section**

### Personnel

Submission Personnel Purchased Services Non-Capital Objects Capital Objects Insurance Other Objects Indirect View All Sections



### **WISEgrants Personnel Screenshot**



# The use of Full-Time Equivalent

- When the "FTE" field is present, the user enters a number up to 1.00 (100%) to identify the percentage of a person's time funded by the grant.
- There are federal reporting requirements under some Acts, such as ESEA, in which DPI must report FTE.
- Staff with an elementary or regular education license can teach reading as long as the reading portion of the FTE does not exceed 25% (Title I-A Schoolwide, IDEA-CEIS and IDEA-Title I Schoolwide set-asides).

# Time & Effort Documentation

§200.430 (i) Standards for Documentation of Personnel Expenses

### Time & Effort documentation is STILL required.

Charges to federal awards must be based on records that accurately reflect the work performed. These records must:

- Be supported by a system of internal control which provides <u>reasonable</u> assurance that the charges are accurate, allowable, and properly allocated.
- Be incorporated into the official records of the subrecipient.



# Personnel Issues with Budgets

Timeline – Subrecipient enters a budget at the beginning of the fiscal year (or before) and may include staff that end up not being there once the school year starts.

- Make sure payroll and grant budgets are in alignment.
- Budge revisions can be made at any time throughout the year.



# Single Audit & State Findings

Single audit findings for time & effort reporting have resulted in DPI discovering that staff charged to the subrecipient's grant were not actually on an approved budget.

This has also been uncovered when reviewing the auditor's special education categorical aid "no-valid license" reports.



# WISEgrants "Staff" Position

If the position normally requires a license but the software allows a subrecipient to roll-up several salaries into one line, the individuals funded by the grant must still hold appropriate DPI licenses.

- Substitute teachers
- Substitute special education aides
- Salary and benefits of staff for activities outside of contracted time (curriculum development, family engagement events, attending professional development)
- Stipends or teacher salary differentials

# WISEgrants "Staff" Position

**Position** 

Area

**Position Activity** 

**Staff** 

**No Description Beyond Position** 

**Staff Roll-Up** 

Credit Reimbursement

**IEP Activities** 

Other Improvement of Instruction

Other Instructional Staff Services

Extended
Contract-Family
Engagement

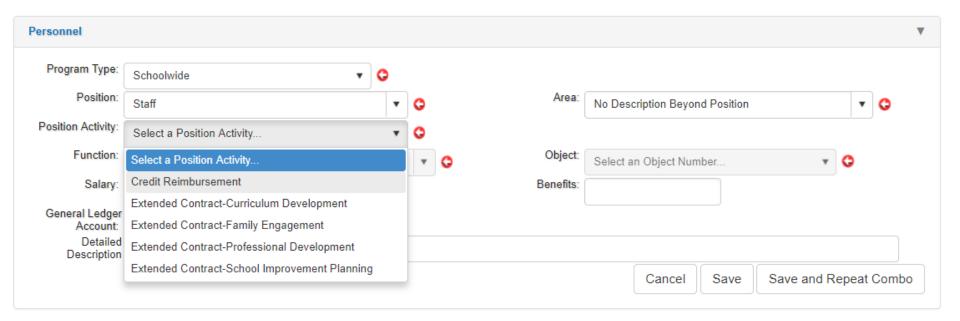
Student Work
Stipends

Transition Services

# WISEgrants "Staff" Position

#### Personnel

Submission Personnel Purchased Services Non-Capital Objects Capital Objects Insurance Other Objects Indirect View All Sections



# **WISEgrants Terminology - Purchase Item**

**WISEgrants** 

What It Is

**Drives WUFAR...** 

**Purchase Item** 

**Broad Category of Cost** 

**Object** 

**Employee Travel** 

**Communications** 

**Property Services** 

**Supplies** 

Contract with Vendor Pupil Transportation

**Equipment** 

#### 400 NON-CAPITAL OBJECTS

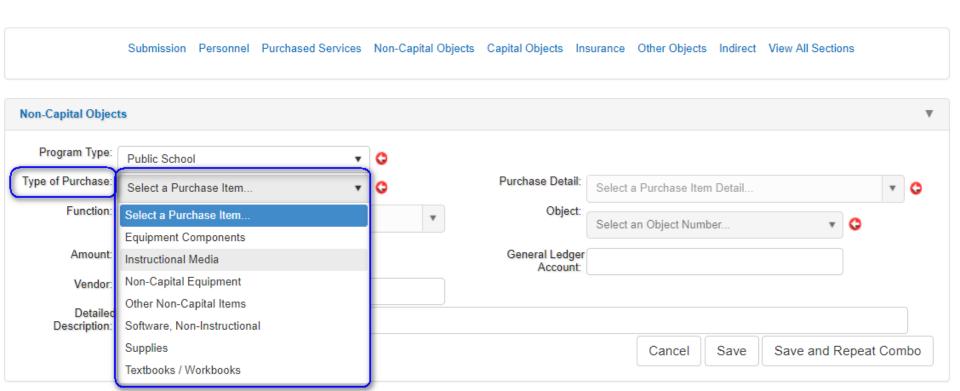
410	Supplies		
	411	General Supplies	
	415	Food	
	416	Medical Supplies	
	417	Paper	
	418	Medical Supplies for IEP Medical Services	
420	Apparel		
430	Instructional Media		
	431	Audiovisual	
	432	Library Books	
	433	Newspapers	
	434	Periodicals	
	439	Other Instructional Media	
440	Non-Capital Equipment		
	443	Containers	
	444	Furnishings	
	445	Measuring Devices	
	446	Tools & Implements	
	449	Other Non-Capital Equipment	

# Purchase Items in WISEgrants are copied directly from WUFAR

450	Resale Items		
460	Equipment Components		
470	Textbooks & Workbooks		
	471	Textbooks	
	472	Workbooks	
	473	Sheet Music	
	479	Other Instructional Books	
480	Non-Capital Technology		
	481	Technology Supplies	
	482	Non-Capital Technology Hardware	
	483	Non-Capital Software	
490	Other	Other Non-Capital Items	

# **Purchase Item**

### Non-Capital Objects



# **Purchase Items in Purchased Services**

**WISEgrants** 

**WUFAR Object** 

**CESA Contract** 

386 - Payment to CESA

For contracted services, you must first select the vendor type before choosing the service provided.

**LEA Contract** 

382 - Payment to WI School District

**WTCS Contract** 

386 - Payment to WTCS District

**Employee Travel** 

342 - Employee Travel

# Purchasing from a CESA

- Unless the item is a non-capital or capital object, the cost will be associated with the purchase item "CESA Contract"
  - Maintenance of Special Education Equipment
  - Library Media
  - Information Technology Services

Supplies, Software or Instructional Materials purchased through a CESA must be coded as non-capital objects and not as CESA contracts



# **Purchase Items in Purchased Services**

**WISEgrants** 

**WUFAR Object** 

Private Vendor
Contract for
Support Services

310 - Personal Services

Private Vendor
Contract for
Instructional Services

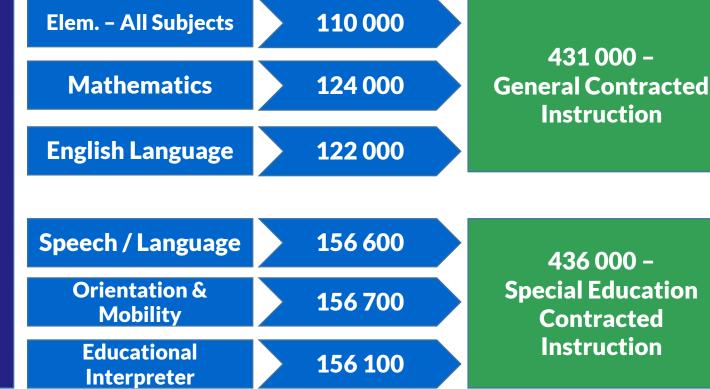
370 - Payment to Non-Gov Agency

IT Private Vendor Contracts

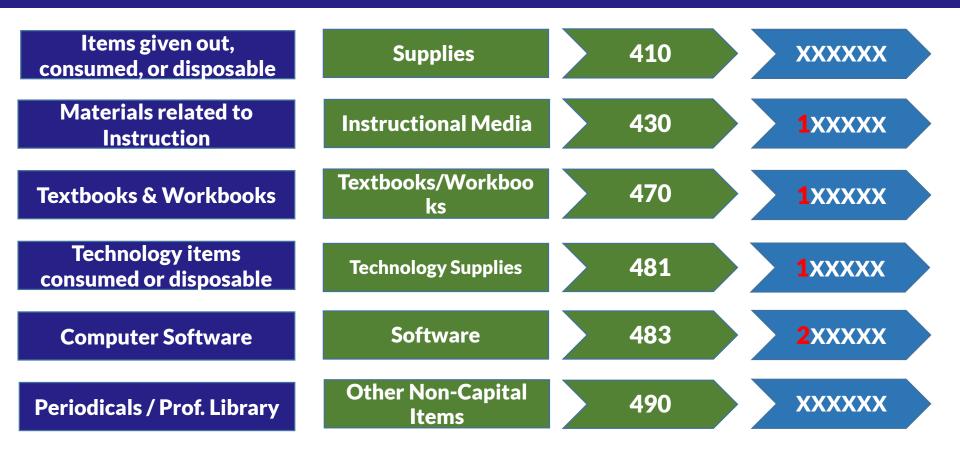
**360 – Information Tech Services** 

# **Purchasing Instruction**

Instruction purchased from a CESA (386), LEA (382), or Private Vendor (370)



# **Different Non-Capital Objects**



# **WISEgrants Terminology - Purchase Detail**

**WISEgrants** 

What It Is

**Drives WUFAR...** 

**Purchase Detail** 

Specific cost tied to a broad category

Function and / or Object

**Curriculum Development** 

Professional Development

Remodeling

Placement Tuition

**Computer Software** 

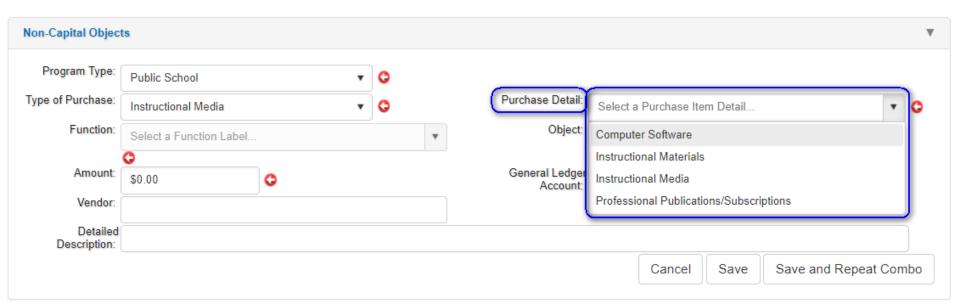
**Field Trip Fees** 

Transition Services

### **Purchase Detail**

### Non-Capital Objects

Submission Personnel Purchased Services Non-Capital Objects Capital Objects Insurance Other Objects Indirect View All Sections



# **Purchase Detail Driving Function / Object**

Purchase Item	<b>Purchase Detail</b>	Function	Object
<b>Property Services</b>	Remodeling	255300	320
Communication	Postage	XXXXXX	353
<b>CESA Contract</b>	Curriculum Devlp.	221200	386
Supplies	Food	XXXXXX	415

# Equipment

Equipment means tangible personal property (including information technology systems) having a useful life of more than one year and a per-unit acquisition cost which equals or exceeds the lesser of the capitalization level established by the non-Federal entity for financial statement purposes, or \$5,000. (2 CFR §200.33)

Equipment is coded under Non-Capital Objects OR Capital Objects, depending on LEA's capitalization threshold.

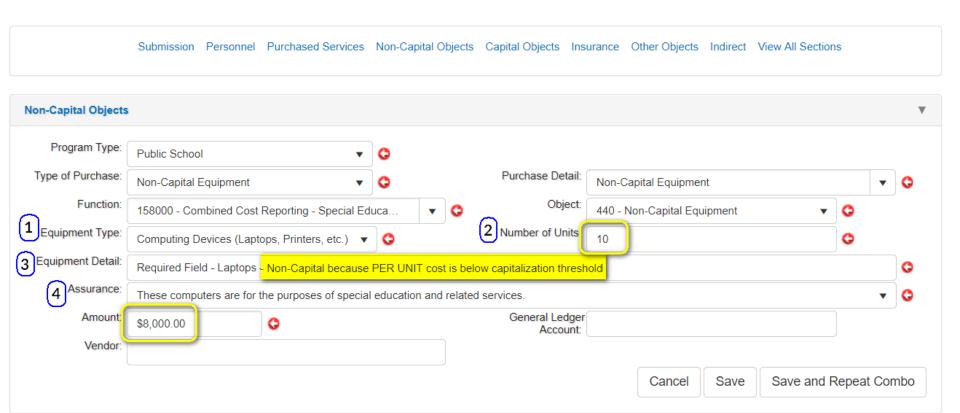
# Equipment

Equipment budget items require additional selections, including:

- Equipment Type list of allowable types determined by grant
- # of Units also determines per unit cost
- Equipment Detail additional description field
- Equipment Assurance required dropdown field providing information on how the equipment purchase aligns with the program

# Equipment

#### Non-Capital Objects



### Instructional or Non-Instructional

#### Functions that begin with 1 are "instructional"

- Functions tied to teachers
- ❖ 122 000 English Language; 158 000 Cross Categorical

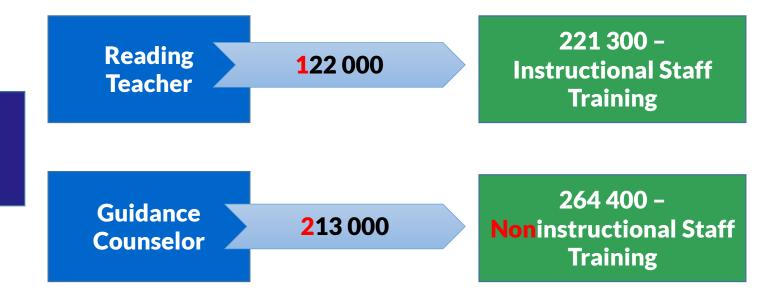
#### Functions that begin with 2 are "non-instructional"

- Functions tied to pupil- and related services staff
- <u>\$\frac{2}{2}12000 School Social Worker</u>; <u>\$\frac{2}15000 School Psychologist</u>;

   <u>\$\frac{2}{1}1000 Dean of Students</u>; <u>\$\frac{2}18000 Physical Therapist</u>

### Instructional or Non-Instructional

Cost:
Professional
Development



### **Instructional and Non-Instructional**

Cost: Materials Regular Curriculum

**120 000** 

Instructional Media Instructional Materials

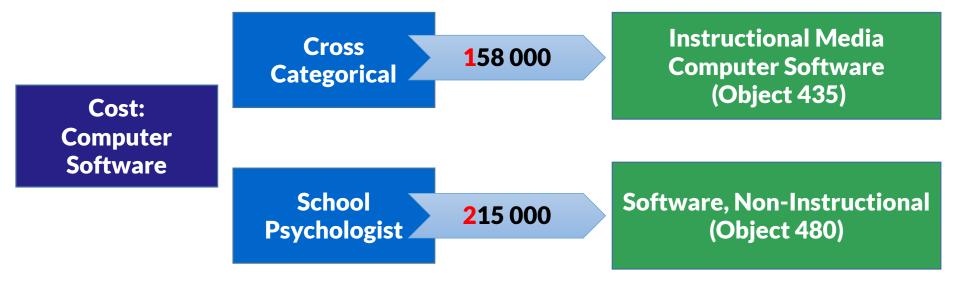
Professional Development

**221 300** 

Other Non-Capital Items
Staff Training Materials

or
Supplies
General Supplies

### Instructional and Non-Instructional



# **Avoid Lumping**

Although tempting, shared costs associated with instructional and non-instructional staff should be separated on the subrecipient's ledger and on the subrecipient's grant budget.

Professional development – easy to enter a single amount for function 221 300 (instructional staff training), but the cost should be broken out between teachers and 264 400 for related services staff (school psychologists, social workers, guidance counselors, pupil services directors, school nurses...)

# **Professional Development Coding**

Conference or workshop registration costs are always a purchased service with a function of 221 300 or 264 400.

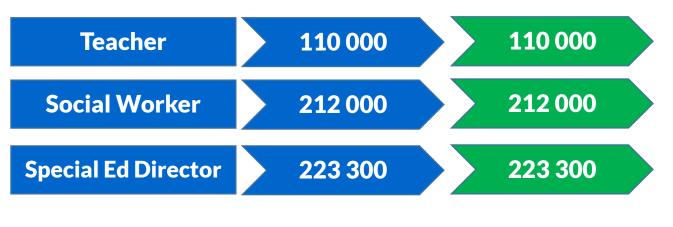
❖ The WUFAR object number is based on who is providing the training – CESA, Private Vendor, DPI, etc.

Object 900 – "Dues and Fees"

Never used for conference or workshop registration costs. Dues and fees cover professional organization fees, DPI staff license fees, or field trip costs.

# **Professional Development**

Salary / Benefit
Functions for Staff
Attending Training
During Regular
Work Schedule



Salary / Benefit
Functions for Staff
Attending Training
Outside of
Regular Schedule

Teacher	110 000	221 300
Social Worker	212 000	264 400
Paraprofessional	159 100	221 300

# **Professional Development**

Employee Travel – Mileage, Lodging, Meals

Teacher	158 000	221 300	
Physical Therapist	218 200	264 400	
School Nurse	214 000	264 400	
Professional Devl.	159 200	221 300	
Sick Leave	159 200	159 200	
Maternity Leave	110 000	110 000	

**Substitute Costs** 

### **Not Good Practice**

If you cannot find the right combination within the drop-downs, the cost may not be allowed. How do we know it happens? The user chooses the "closest" WUFAR combination and then in the detailed description identifies what the cost really is (usually an unallowed cost).

- ❖ IDEA examples: Medicaid billing, purchased autism instruction from a private vendor, contracted music therapy...
- Title I example: Entering LEA staff in as a purchased service to avoid having to enter an Educator File Number

	and benefits of staff employed by an LEA.	education support and is appropriately licelised (2 CFR § 200.444).
	1	
X	MUSIC THERAPY - Costs for contracted therapy from a private vendor.	Adaptive music education or music therapy provided by a private contractor (object 370) is not eligible for IDEA or state special education categorical aid.
		Only the salary and benefits of an LEA, CESA, or CCDEB employed teacher holding a DPI license '1859' for Music - Special Education are eligible for IDEA reimbursement for the time the teacher provides instruction to students with disabilities per the student's IEP requirements.
	ECHALLED THE LABOR	
X	FORWARD HEALTH REVALIDATION FEE: Costs associated with validating the	Every few years, each LEA needs to go into the Forward Health web portal and revalidate the LEA as eligible for SBS revenue. There is a fee associated with the revalidation.

to 27-940 or 949-223300-019.

SUPERINTENDENT /

ADMINISTRATOR · Salary

LEA as eligible for Medicaid SBS services through the Department

of Health Services.

DISTRICT

The salary and benefits of a superintendent / district administrator cannot

This cost should be booked to Fund 27 as a cost associated with the delivery

of special education, but it is not a cost that is eligible for IDEA or state special education categorical aid reimbursement. This fee should be coded

be charged to federal grants even if the administrator is providing special

education support and is appropriately licensed (2 CFR § 200 444)

# **Budget Revisions**

Grant budgets can be revised throughout the grant fiscal year.

Certain factors may require revisions to the budget, such as changes to the allocation, finalizing of carryover, changes made by the LEA to the grant application, or amounts claimed for a line item exceeding the amount budgeted.

# **Budget Revisions**

Under the Uniform Grant Guidance, LEAs are allowed to claim an overage of line items as long as the accumulated line item overage does not exceed 10% of the approved budget (and is within the approved total budget amount). (2 CFR § 200.308(e))

These overages will cause budget validations that will prevent the submission or future budgets or claims until resolved.

Submission Personnel Purchased Services Non-Capital Objects Capital Objects Insurance Other Objects Indirect View All Sections

If using the Wisconsin Uniform Financial Accounting Requirements (WUFAR), a subrecipient's ledger should appropriately reflect the approved budget (and local WUFAR crosswalk, if applicable) in WISEgrants. If you are unable to find the WUFAR combination for your budget item, please do not find the closest match but report the missing combinations. All requests will be dealt with in a timely manner.

n order to submit the IDEA - Flow-through budget, complete the tasks identified here:

Messages:

- The following budget combinations have been claimed in amounts greater than the current budget revision. Please update the following items and submit for approval:

  Purchased Services 341/Pupil Transportation 256750/Contracted Specialized Transportation : The cumulative claimed to date amount is
  - \$1,140.98. Line items with this combination must be increased by \$140.98
  - Purchased Services 341/Pupil Transportation 256770/Field Trips Contracted: The cumulative claimed to date amount is \$3,582.60. Line items with this combination must be increased by \$582.60
  - Purchased Services 342/Employee Travel 218200/Physical Therapy: The cumulative claimed to date amount is \$1,591.04. Line items with this combination must be increased by \$91.04

# **Technology Changes for 2018-19**

US Census Bureau began requesting additional detail for technology-related expenditures as part of Fiscal Survey F-33.

WUFAR was updated on October 1, 2018 with changes to Objects and Functions. New codes are in use for 2018-19 in WISEgrants and in reporting to School Financial Services.



# **Function Changes for 2018-19**

#### **New Functions**

- 221 500 Instruction Related Technology
  - Technology for instructional support (e.g. technology centers, computer labs, technology integration)
  - Classroom technology used by students or have an instruction focus are coded to 100000s

- 295 000 Administrative Technology Services
  - Centralized IT costs (e.g. network, IT support, licenses for all staff, IT staff salary and benefits)
  - Replaces Function 266000



#### Objects - New and revised

- 321 Technology Related Repairs and Maintenance
- 327 Construction Services
- 329 Cleaning Services
- 360 Data Process and Coding Services
- 481 Technology Supplies
- 482 Non-capitalized Technology Hardware
- 581 Technology-Related Hardware (Capital)
- 582 Technology Software (Capital)



#### **Objects - Rental**

Equipment, Site, and Building Rental will be moved from Capital Objects to Purchased Services:

- 320s Equipment Rental Moved from 500s to 320s
  - 322 Rental of Computers and Related Equipment
  - 325 Vehicle and Equipment Rental
- 326 Site Rental Moved from 517
- 328 Building Rental Moved from 537



#### **Objects - Software**

Three options for software:

As a purchased service under 360 – Technology & Software Services:

362 – Software as a Service

Usually involves a subscription or periodic fees

Buying use of software for a period of time, as opposed to owning it

Software as a service, cloud-based computing, etc.



#### **Objects - Software**

Three options for software:

As a non-capital object under 480 – Non-Capital Technology:

483 – Non-Capital Software

Software your LEA actually owns, including one-time "perpetual" fee Purchase falls below capitalization threshold

No differentiation between instructional or non-instructional

(Object 435 - Computer Software under 430 - Instructional Media has been removed)



#### **Objects - Software**

Three options for software:

As a capital object under 580 – Technology:

582 - Technology Software

Software your LEA actually owns, including one-time "perpetual" fee Unit cost ABOVE your LEA's capitalization threshold



### **Additional Technical Assistance**

#### Allowable Costs Technical Assistance Page

https://dpi.wi.gov/wisegrants/uniform-grant-guidance/allowablecosts

#### Allowable Costs Checklist

https://dpi.wi.gov/sites/default/files/imce/wisegrants/pdf/Allowable%20costs%20checklist Final.pdf

#### Claiming Funds

https://dpi.wi.gov/wisegrants/claiming-federal-funds

#### **WUFAR**

https://dpi.wi.gov/sfs/finances/wufar/overview

# SCENARIOS



### Scenario #1

A math teacher at a Title I Targeted Assistance school, who is paid out of Title I, Part A, is attending an RtI conference hosted by a private vendor in a different city. All costs related to the conference are being charged to the Title I-A grant.

Provide the accounting string including Fund, Location, Object, Function and Project Codes for the expenses below:

- Teacher's salary and benefits while attending the conference
- Conference registration cost
- Mileage
- Lodging/Meals
- District substitute covering the teacher's classes

### Scenario #1

Provide the accounting string including Fund, Location, Object, Function and Project Codes for the questions below:

- How would you code a <u>district</u> employed substitute teacher covering classes for a cross categorical teacher charged to the IDEA grant who was on paternity leave?
- How would you code a <u>contracted</u> substitute teacher covering classes for a cross categorical teacher charged to the IDEA grant who was on maternity leave?

Hint: It does not relate to the type of leave used in the example.

Title I math teacher's salary / benefits while attending the conference

Fund 10 Location **XXX** 

Object 100

Function **124 000** 

Project **141** 

Fund 10

Location XXX

Object 200

Function **124 000** 



#### **Conference Registration Costs**

Fund 10 Location XXX

Object 310

Function **221 300** 



Mileage, Lodging and Meals

Fund 10 Location XXX

Object 342

Function **221 300** 



District substitute teacher covering the Title I math teacher's classes

Fund 10 Location **XXX** 

Object 100

Function **221 300** 

Project **141** 

Fund 10

Location **XXX** 

Object 200

Function **221 300** 



A <u>district</u> employed substitute teacher covering classes for a cross categorical special education teacher charged to the IDEA flow-through grant who was on paternity leave

**Object Fund** Location **Function Project** XXX 100 **158 000** 341 **Fund** Location **Object Function Project** XXX 341 **27** 200 **158 000** 

A <u>contracted</u> substitute teacher covering classes for a cross categorical special education teacher charged to the IDEA flow-through grant who was on maternity leave

Fund **27** 

Location XXX

Object 370

Function **436 000** 



### Scenario #2

The school district is purchasing two software programs, Read 180 for reading interventions and behavioral progress monitoring software for the school psychologist. Both are charged to the IDEA CEIS grant.

Provide the accounting string including Fund, Location, Object, Function and Project Codes for both software types.

Reading intervention software charged to IDEA - CEIS

Fund 10 Location **XXX** 

Object **362 or 483** 

Function **122 000** 

Project 341

Behavioral progress monitoring software charged to IDEA - CEIS

Fund 10 Location XXX

Object **362 or 483** 

Function **215 000** 

### Scenario #3

How would you code the following, paid for using local funds only:

- Purchasing visual impairment instruction from CESA
- Maintaining FM system maintenance from CESA
- Purchasing speech and language testing supplies from CESA

Provide the accounting string including Fund, Location, Object, Function and Project Codes.

Visual Impairment Instruction purchased from CESA (local funds)

Fund **27** 

Location **XXX** 

Object 386

Function **436 000** 

Project **019** 

FM System Maintenance purchased from CESA (local funds)

Fund **27** 

**XXX** 

Object 386

Function **254 410** 

Speech / Language testing supplies purchased from CESA (local funds)

Fund **27** 

Location XXX

Object 411

Function **156 600** 



### Scenario #4

Provide the accounting string including WISEgrants Purchase Item, Fund, Location, Object, Function and Project Codes for each of the Title I-A grant expenses below:

- Reading A to Z licenses for computer-based instructional software (paid for as a service)
- Books handed out at a parent literacy night for families to take home
- Books for teacher book study on RtI
- Math intervention workbooks
- Universal Screener software (one-time software purchase)
- Phonics sound cards for Kindergarten

Reading A to Z - licenses for computer-based software

**Purchase Item: Technology and Software Services** 

Fund 10

Location XXX

Object 362

Function **122 000** 



Picture books for parent literacy night for families to take home

**Purchase Item: Supplies** 

Fund 10

Location **XXX** 

Object 410

Function **219 000** 



Books for teacher book study on RtI

**Purchase Item: Other Non-Capital Items** 

Fund 10

Location XXX

Object 490

Function **221 400** 



#### Math intervention workbooks

**Purchase Item: Textbooks / Workbooks** 

Fund 10

Location XXX

Object 470

Function **124 000** 



#### **Universal Screener Software**

**Purchase Item: Software** 

Fund 10

Location XXX

Object 483

Function **221 900** 



Phonics sound cards for Kindergarten

**Purchase Item: Instructional Media** 

Fund 10

**XXX** 

Object 430

Function **122 000** 

